

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARIBEL RODRIGUEZ,	)	
	)	No. 08 C 2020
Plaintiff,	)	
v.	)	
	)	
CITY OF CHICAGO, ILLINOIS, and	)	
CHICAGO POLICE OFFICERS	)	Judge Castillo
M. B. KAZARNOWICZ, Star No. 9003,	)	
M. J. LOPEZ, Star No. 7433, and	)	Magistrate Judge Cole
VIRGINIA WARNECKE, Beat No. 1134,	)	
	)	
Defendants.	)	

**DEFENDANT CITY OF CHICAGO'S MOTION  
FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant City of Chicago ("the City"), through its attorney Mara S. Georges, Corporation Counsel of the City of Chicago, pursuant to Federal Rule of Civil Procedure 6(b), moves this Court for an extension of time until June 30, 2008, to answer or otherwise plead to plaintiff's complaint. In support of this motion, the City states as follows:

1. Plaintiff filed her six-count complaint on April 9, 2008. The complaint alleges federal claims under 42 U.S.C. § 1983 and Illinois state law claims against the City and three Chicago police officers.
2. On May 7, 2008, the Court granted the City's motion for extension of time until June 2, 2008, to answer or otherwise plead to plaintiff's complaint.
3. On May 23, 2008, the Court granted defendant officers Kazarnowicz and Lopez's motion for extension of time until June 30, 2008, to answer or otherwise plead to plaintiff's complaint.
3. The City is engaged in, but has not yet completed, investigating the allegations in

the plaintiff's complaint and gathering and examining the pertinent records.

4. Therefore, the City requests until June 30, 2008 - the same time the Court has given the individual defendants - to answer or otherwise plead in response to the complaint.

5. This motion is not brought for the purpose of delay or any other improper purpose, but so that the City can properly respond to the allegations in plaintiff's complaint.

7. Plaintiff will not be prejudiced if the requested extension of time is granted.

8. The undersigned called plaintiff's counsel, Jeffrey B. Granich, today, but was unable to establish contact with him. The undersigned did, however, speak with Mary McCahill, attorney for defendants Kazarnowicz and Lopez, neither of whom have any objection.

For these reasons, the City requests that the Court grant the City's motion for an extension of time to and including June 30, 2008, to answer or otherwise plead to plaintiff's complaint.

Respectfully submitted,

MARA S. GEORGES  
Corporation Counsel of the  
City of Chicago

Dated: June 2, 2008

By: s/ Bhairav Radia  
Bhairav Radia  
Assistant Corporation Counsel

30 North LaSalle Street, Suite 1020  
Chicago, Illinois 60602  
(312) 744-6919